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February 2, 2022

By ECF

The Honorable Loretta A. Preska
United States District Judge
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *United States v. Adedayo John et al.*, 21 Cr. 00609 (LAP)

Dear Judge Preska:

I write to respectfully request an order temporarily modifying Oluwadamilola Akinpelu's conditions of release to allow Pretrial Services to release Ms. Akinpelu's passport to her. As a condition of release, Ms. Akinpelu was directed to surrender her passport to Pretrial Services. In attempting to open a personal bank account, a banker at Bank of America advised her that she needed to present her passport in addition to her driver's license. Accordingly, Ms. Akinpelu is respectfully requesting the release of her passport subject to the below conditions.

I have conferred with AUSA Matthew Weinberg and with Pretrial Services Officer Francesca Piperato, who has advised me that Pretrial has no objection to this application provided that Ms. Akinpelu return the passport the same day that it is released to her and that she provide Ms. Piperato with proof that the account was opened. The government defers to Pretrial. Ms. Akinpelu and I appreciate the Court's attention to this matter.

Respectfully submitted,



Ezra Spilke

cc: All counsel of record, by ECF
Ms. Francesca Piperato, by email

SO ORDERED.

Dated: February 3, 2022
New York, New York



LORETTA A. PRESKA
Senior United States District Judge